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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

Christopher Kohls,

*Plaintiffs,*

v.

Robert A. Bonta, *et al.*,

*Defendants.*

Civil No. 2:24-cv-02527-JAM-CKD

**Notice of Related Cases**

Judge John A. Mendez

The Babylon Bee, LLC and Kelly  
Chang Rickert,

*Plaintiffs,*

v.

Robert A. Bonta, *et al.*,

*Defendants.*

1. Pursuant to Local Rule 123, Plaintiffs notify the Court of the following related cases pending in this District: *Rumble Inc. v. Bonta*, no. 2:24-cv-03315 (E.D. Cal. Nov. 27, 2024), and *X Corp v. Bonta.*, no. 2:24-cv-03162 (E.D. Cal. Nov. 14, 2024).

2. *Rumble* and *X* share many similarities with this case. All three cases involve the same defendants: Rob Bonta and Shirley N. Weber. All three cases also involve similar claims against the same California law: First and Fourteenth Amendment claims against AB 2655. Cal. Elec. Code § 20516. *Compare* Compl. ¶¶ 344–379, *The Babylon Bee, LLC v. Bonta*, ECF No. 21, *with* Compl. ¶¶ 109–142 *Rumble*, no. 2:24-cv-03315, ECF No. 1, *and* Compl. ¶¶ 96–113, 130–145, *X Corp.*, no. 2:24-cv-03162, ECF No. 1.

3. This Court already found that *The Babylon Bee, LLC v. Bonta*, (originally no. 2:24-cv-2787), and *Kohls v. Bonta*, no. 2:24-cv-02527, “are related within the meaning of Local Rule 123.” Related Case Order, ECF No. 18. This led to assignment of both cases to Judge John A Mendez to effect “a substantial savings of judicial effort” and promote the convenience of the parties. *Id.* This Court subsequently consolidated the two cases under the name *Kohls*. Stip. and Order Consolidating Cases, ECF No. 20.

4. These cases thus have a significant overlap in questions of fact, law, and requests for relief, and Judge Mendez is already familiar with the legal issues. Therefore, assigning this action to Judge Mendez will likely save substantial judicial and party resources.

DATED: December 2, 2024

s/ Johannes Widmalm-Delphonse  
Johannes Widmalm-Delphonse  
Counsel for The Babylon Bee, LLC and  
Kelly Chang Rickert

**PROOF OF SERVICE**

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all attorneys of record in this case. I also certify that I will email the file-stamped copy of the foregoing document to all attorneys of record in *Rumble Inc. v Bonta*, no. 2:24-cv-03315, and *X Corp. v. Bonta*, no. 2:24-cv-03162.

DATED this 2nd day of December, 2024.

s/ Johannes Widmalm-Delphonse  
Johannes Widmalm-Delphonse  
Counsel for *The Babylon Bee, LLC* and  
*Kelly Chang Rickert*